

**CHARGE OF DISCRIMINATION
TIMOTHY OLIPHANT
PAGE 1**

I. Overview of Individual and Class Allegations

AK Steel Corporation has discriminated and continues to discriminate against me in the terms and conditions of my application for employment with them on the basis of my race, African-American, by denying me the opportunity to be hired while hiring equally or less qualified white employees and subjecting me to a racially hostile application process and other forms of discrimination. I believe that AK Steel Corporation's actions are part of a continuing pattern and practice of discrimination against African-American applicants for employment and employees, including but not limited to, denying applicants hiring opportunities while providing such opportunities to equally or less qualified white applicants and subjecting them to a racially hostile application process.

II. Statement of Facts

I applied to AKSteel in April 2002 for a General Laborer position at their factory in Ashland, KY. Having found out at church that AKSteel was accepting applications, I went to the AKSteel booth at a job fair at the mall. There I met AKSteel employees Rodney Cosby, a black man, and Susan Lester, a white woman. Ms. Lester gave me her business card and told me I could call her to schedule a time to sit for the AKSteel entrance exam. I faxed my resume to Mr. Cosby, which detailed my twelve years of experience working as a Machine Operator for the New Boss and Coke Corporation and five years laying rail and tie for the Norfolk & Southern Rail Company. I was not asked to fill out an application or answer any questions. Two to three days after having taken AKSteel's entrance exam, I called Ms. Lester again, as per her instructions, to find out how I did on it, and she informed me that I hadn't passed. She didn't tell me what was my score or offer any other information about it. I have not had any contact with AKSteel subsequently. I am currently employed by PIDC doing maintenance work.

III. Statement of Discrimination

I believe that AK Steel Corporation has discriminated against me and continues to discriminate against me in the terms and conditions of my applications for employment with them on the basis of my race, African-American, in violation of the Civil Rights Act of 1964, as amended, because white applicants with fewer qualifications than me have been hired and I have not, and because I have been subjected to a racially hostile application process and other forms of discrimination and denied the right to apply for work in an environment free of racial discrimination.

I have been adversely affected by these discriminatory practices by being deprived of the equal opportunity to be hired. Such discrimination denies me and other African-Americans the right to be hired for positions for which we are qualified.

This systemic discrimination also adversely affects the status of African-Americans as employees by promoting and reinforcing racial stereotypes and bias in hiring.

**CHARGE OF DISCRIMINATION
TIMOTHY OLIPHANT
PAGE 2**

IV. Statement of Classwide Discrimination on the Basis of Race

Based on my experiences, I believe that AK Steel Corporation has engaged and continues to engage in a pattern and practice of discrimination against its African-American applicants for employment and employees that denies them equal employment opportunities in ways including but not limited to the following: denying them hiring opportunities while providing such opportunities to equally or less qualified white employees and subjecting them to a racially hostile application process and work environment in which few other African-Americans are employed. This policy violates Title VII of the 1964 Civil Rights Act, 42 U.S.C. Section 2000(e), *et seq.*

I believe this policy has effected a class of black persons comprised of all past, present and future black applicants for employment with AK Steel. I believe that these discriminatory practices occur throughout AK Steel Corporation. I make this charge on behalf of myself and all similarly situated African-American applicants for employment and employees.

I declare under penalty of perjury that the foregoing is true and correct.

Date: 6/12/02

Timothy Bliphant

Charging Party (signature)